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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)	
)	2:17-cr-00001-JAD-CWH
Plaintiff,)	
)	STIPULATION TO CONTINUE
vs.)	SENTENCING AND DISPOSITION
)	FOR Mr. Oliveira Santos
LEONARDO A. OLIVEIRA-SANTOS,)	
)	
)	
Defendant.)	

IT IS HEREBY STIPULATED AND AGREED by and between Defendant, LEONARDO AUGUSTO OLIVEIRA SANTOS, by and through his counsel, TODD M. LEVENTHAL, ESQ., and the United States of America, by its counsel, JOHN PATRICK BURNS, Assistant U.S. Attorney, that the Sentencing in the above-captioned matter currently set for Monday September 18, 2017 at 11:00a.m. be vacated and continued to at least 30 days at a time convenient for the court preferably on a Friday .

This Stipulation is entered into for the following reasons;

1. Other issues remain and are pending that are vital to the sentencing of Mr. Oliveira-Santos.
2. Mr. Oliveira-Santos is in custody and agrees with the requested continuance.
3. Mr Leventhal has spoken to JOHN P. BURNS, Assistant United States Attorney, and he has no objection to this continuance.

1 4. Mr. Leventhal will commence U.S. vs. Bundy, et al., on October 10, 2017, and will
2 not be available from Monday through Thursday during Trial. Therefore, it is
3 respectfully requested that the current sentencing be set for a Friday within the next
4 30 days if the court is available.

5 5. Additionally, denial of this request for a continuance could result in a miscarriage
6 of justice.

7
8 DATED this 15th day of September, 2017.

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10 /s/ Todd M. Leventhal
11 TODD M. LEVENTHAL, ESQ.
Counsel for Leonardo A. Oliveira-Santos

/s/ John Patrick Burns
JOHN P. BURNS
Assistant U.S. Attorney

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15 Submitted By: LEVENTHAL & ASSOCIATES, PLLC

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17 By: /s/ Todd M. Leventhal
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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)	
)	2:17-cr-00001-JAD-CWH
Plaintiff,)	
)	
vs.)	
)	
LEONARDO A. OLIVEIRA-SANTOS)	
)	
)	
Defendant.)	

FINDINGS OF FACT

Based on the stipulation of counsel, and good cause appearing, the Court finds that:

1. Other issues remain and are pending that are vital to the sentencing of Mr. Oliveira-Santos.
2. Mr. Oliveira-Santos is in custody and agrees with the requested continuance.
3. Mr Leventhal has spoken to JOHN P. BURNS, Assistant United States Attorney, and he has no objection to this continuance.
4. Mr. Leventhal will commence U.S. vs. Bundy, et al., on October 10, 2017, and will not be available from Monday through Thursday during Trial. Therefore, it is respectfully requested that the current sentencing be set for a Friday within the next 30 days if the court is available.

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5. Additionally, denial of this request for a continuance could result in a miscarriage of justice.

CONCLUSIONS OF LAW

1. For all the above-stated reasons, the ends of justice would be best served by granting a continuance of the current Sentencing and Disposition Hearing and reset it for a time after October 16, 2017 at a time convenient for the court. Preferably on a **Friday** morning.

ORDER

Accordingly, IT IS SO ORDERED that the current Sentencing and Disposition is vacated and the same is continued and reset for October 27, 2017, at the hour of 9:00 a.m.

DATED this 17th day of September, 2017.


JENNIFER A. DORSEY
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of September, 2017 a true and correct copy of the,

STIPULATION AND ORDER TO CONTINUE TIME FOR SENTENCING AND

DISPOSITION was filed through the CM/ECF filing system and was electronically served to the following registered addresses on file for this instant case :

John Patrick Burns: John.P.Burns@usdoj.gov, USANV.team2@usdoj.gov,
veronica.criste@usdoj.gov

/s/ Todd M. Leventhal
An Employee of TODD M. LEVENTHAL, ESQ.
LEVENTHAL AND ASSOCIATES, PLLC.